

Laura Casillas/R3/USEPA/US

To

(b) (4)

06/14/2007 06:09 PM

cc "James VanOrden" <VanOrden.James@epamail.epa.gov>
Laura Casillas/R3/USEPA/US

bcc

Subject Re: Oceana Salvage Update dated 5/16/2007

Thank you for the update describing the various cleanup options SCS engineers has been considering. EPA is finalizing an Administrative Order on Consent (AOC) which delineates each step to be taken by your client in response to the cleanup of lead contaminated soils and battery casings at Oceana Salvage. Additionally EPA has had discussions with the Navy to enable your client to address the contamination Oceana Salvage non-maliciously created on Navy property. Once this order is negotiated between your client and EPA, both parties will proceed according to the process agreed upon on the order.

As you described, the goals of the cleanup remain:

1. Remediation of the access road to the site
2. Remediation (most specifically removal) of lead-contaminated, stockpiled soils, and
3. The delineation (and remediation if necessary)



SDMS DocID 2095121

Project Specifics:

Access Road Cap

The approach described for using the woven geotextile (Proplex 2002 or approved equal) as a barrier, in combination with a minimum 6 inch cover along the cap of VDOT crusher run aggregate is consistent with EPAs requirement to minimize human exposure to hazardous materials at the site.

Additionally, you will be responsible for delineating contamination along the access road and up to the service building at the Oceana Salvage Yard-essentially the road which customers and employees drive over on an daily basis. EPA is also requesting that an orange warning barrier be used in the cap, to further protect its integrity.

Soil Stockpiles

Your client is responsible for delineating the extent of contaminated soils in and around the stockpiles and estimating the amount needed to be disposed. Your intention to remove these contaminated soils from the property is consistent with EPAs requirement to minimize human exposure to hazardous materials at the site, and is the ideal approach. EPA is also requesting that an orange warning barrier be used in the cap, to further protect its integrity. Additionally EPA sees it fit that wastes from these piles be segregated into hazardous or non-hazardous groups for disposal or potential recycling respectively--a cost-saving and resource mindful approach. These details will be a part of the RAP described below.

Burial Area 1 Delineation

Development of a scope of work and resource estimates for delineating any contamination left behind at the original disposal area on Navy property will be a part of EPA's Response Action Plan requirement as outlined in our Administrative Order on Consent.

Response Action Plan:

Each of these items addressed above will be a component of the Response Action Plan (RAP). In the RAP you and your client will describe your resources and how you propose to do get the work done. EPA will make sure the plan meets the intentions of the order and provides adequate protective measures. EPA will also be on site while the work is performed and will share some samples as a quality control measure.

Call me with any questions. We will be in touch in the next week or two with the final order for you client to review.

to -----\Sent by EPA Wireless E-Mail Services.